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December 21, 2022

VIA ECF

MEMO ENDORSED

The Honorable Edgardo Ramos
United States District Court Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square, Courtroom 619
New York, NY 10007

The Parties' request to be excused from submitting a proposed discovery plan or exchanging initial disclosures is granted. The Parties shall submit a joint status letter by January 31, 2023. SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: December 21, 2022
New York, New York

Re: *Haitian Bridge Alliance et al. v. U.S. Dep't of Homeland Sec. et al.*, No. 1:22-cv-08344-ER

Dear Judge Ramos:

I write on behalf of all parties—Plaintiffs Haitian Bridge Alliance, African Communities Together, and UndocuBlack Network and Defendants U.S. Department of Homeland Security (“DHS”), U.S. Customs and Border Protection (“CBP”), U.S. Immigration and Customs Enforcement (“ICE”), and the Federal Bureau of Prisons (“BOP”)—in the above-captioned matter brought under the Freedom of Information Act (“FOIA”). At this time, we jointly request that the parties be excused from submitting a proposed discovery plan or exchanging initial disclosures under Federal Rules of Civil Procedure 16(b), 26(a)(1) and 26(f)(3). *See* Local Civ. R. 16.1; Fed. R. Civ. P. 26(a)(1).

Plaintiffs filed their Complaint on September 30, 2022, and Defendants filed their Answer on December 5, 2022. As described in the Complaint, there are two FOIA requests at issue in this case. The first request, submitted by Plaintiffs on October 1, 2021, was directed to several agencies, including Defendants DHS, CBP, ICE, and BOP. The second request, submitted on February 25, 2022, was directed to Defendants DHS and CBP. Following the filing of the Complaint, the parties began conferring about the requests and are currently in the midst of negotiations. The parties thus respectfully propose that they submit a joint letter to the Court by January 31, 2023, regarding the status of their progress in resolving these requests and raising any disputes that require the Court’s intervention, to the extent the parties are not able to resolve such disputes informally.

We thank the Court for its consideration of this matter.

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Respectfully submitted,

/s/ Sara Fatima Dhanji

Stephen J. Fuzesi (Bar No. SF2000)

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